



U.S. Department of Transportation
Federal Aviation
Administration

800 Independence Ave., S.W.
Washington, DC 20591

SEP 25 2000

Mr. Dale K. Gordon
Americas Aerospace Quality Group (AAQG)
Rolls-Royce Allison
P.O. Box 420
Mail Stop U-24
Indianapolis, IN. 46206-0420

Dear Mr. Gordon:

During the 6th International Aerospace Quality Group (IAQG) meeting held in Seattle, WA, on June 29, 2000, a proposal was made that the Federal Aviation Administration (FAA) Production and Airworthiness Certification Division (AIR-200), issue a letter recognizing AS9100 Quality Systems - Aerospace-Model for Quality Assurance in Design, Development, Production, Installation, and Servicing as a quality management system standard for aviation related entities.

Based upon the request, AIR-200 has performed an extensive comparative review and has found the Society of Automotive Engineers (SAE) quality management resource document, AS9100 (Issued 1999-11) to be a comprehensive quality standard containing the basic quality control elements required by the current Code of Federal Regulations (CFR) Title 14, Part 21. The organizational system that meets the elements of AS9100, if effectively employed, should also meet the FAA's expectations for a manufacturing quality control system. Those organizations that choose to implement AS9100, as a foundation for their quality management system should ensure that all applicable elements of Part 21 are addressed in their system.

The Aircraft Certification Service believes that the effective implementation of AS9100 will enhance an organizations' overall performance, as long as the statement in the resource document "***Other Quality System requirements imposed by the applicable Regulatory Authorities shall be included or referenced in the Quality System documentation.***" is strictly adhered to. Though the FAA does not require the use of the additional elements found in AS 9100, it recognizes their benefits to the aviation industry in increasing an organization's efficiency and reducing product and system variance.

In stating that AS91 00 meets the FAA's expectations, for a manufacturing quality control system,- the FAA is not accepting the registration of quality systems by third parties, to any standard, as compliance to CFR Title 14, Part 21. This is due in that the FAA has no control over their contents, they can be changed by the industry, and they possess no regulatory requirements or enforcement capability. CFR Title 14, Part 21 is the regulatory requirement for FAA production approval holders and it remains their responsibility to demonstrate compliance, including that of their suppliers, to all applicable sections. Any use of third party quality system surveillance is considered a supplier activity by the FAA and must be appropriately controlled.

The Aircraft Certification Service applauds the efforts of the AAQG in taking a leadership role in enhancing aviation quality. If we can be of further assistance, please feel free to contact a member of the Production and Airworthiness Certification Division at (202) 267-8361.

Sincerely,



Frank P. Paskiewicz
Manager, Production and Airworthiness
Certification Division, AIR-200